

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

CHRISSE PARSONS

Case No.

3:19mj422

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 29, 2018 in the county of Montgomery in the Southern District of Ohio, the defendant(s) violated:

Code Section

21 U.S.C. 841(a)(1); 841(b)(1)(C)

Offense Description

Knowingly and intentionally possessing with the intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance

This criminal complaint is based on these facts:

See Attached Affidavit.

☒ Continued on the attached sheet.

Fred Zollers
Complainant's signature

Fred Zollers, FBI Task Force Officer

Printed name and title

Sworn to before me and signed in my presence.

Date: 07/31/2019

City and state: Dayton, Ohio

Sharon L. Ovington
Judge's signature

Hon. Sharon L. Ovington, U.S. Magistrate Judge

Printed name and title

I, Fred Zollers, a Task Force Officer for the Federal Bureau of Investigations and Montgomery County Sheriff's Office (hereinafter referred to as the "Affiant") being duly sworn, deposes as follows:

I.

INTRODUCTION

Your Affiant is a Task Force Officer with the Federal Bureau of Investigations ("FBI") within the meaning of Title 21, United States Code ("U.S.C."), Section 878. That is, an officer of the United States who is empowered by law to conduct criminal investigations of and to make arrests for offenses as detailed in 21 U.S.C. § 878. Your Affiant is a law enforcement officer and has been employed by the Montgomery County Sheriff's Office since 2006, and is currently assigned to the FBI Southern Ohio Safe Streets Task Force, Dayton Office.

By virtue of Affiant's assignment with the FBI, he performs and has performed various tasks which include, but are not limited to:

- (a) Functioning as an undercover agent for the primary purpose of obtaining intelligence on drug trafficking and the inner working of drug organizations;
- (b) Functioning as a surveillance agent for the primary purpose of observing and movements of drug traffickers and those suspected of trafficking in drugs;
- (c) Functioning as a case agent which entails the supervision of specific aspects of drug investigations;
- (d) The tracing and tracking of monies and assets gained by drug traffickers from the illegal sale of drugs.

II.

PURPOSE OF AFFIDAVIT

3. This affidavit is made in support of an application for a federal arrest warrant and criminal complaint against **Chrissy PARSONS** for:

- a. knowingly and intentionally possessing with the intent to distribute and to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance in violation of 21 U.S.C. § 841(a)(1) and 841(b)(1)(C).

I make this affidavit based upon my participation in this investigation, including witness interviews and reports by other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my

training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

III.

SUMMARY OF PROBABLE CAUSE

4. On July 29, 2018, an Ohio State Highway Patrol (OSHP) Trooper initiated a traffic stop on a Chevrolet Equinox on US-35 near Woodman Drive, Dayton, Ohio for a traffic violation. **Larry SMITH** was the driver and **Chrissy PARSONS** was the passenger. After waiving her *Miranda* rights, **PARSONS** admitted to possessing an unknown amount of narcotics inside of her body. She advised she would cooperate and retrieved the narcotics. The Miami Valley Regional Crime Laboratory determined the narcotics were heroin, a Schedule I controlled substance, with a net weight of 86.69 grams.


5. On January 10, 2019, an OHSP Trooper initiated a traffic stop on a Chevrolet Equinox on US-35 near I-75 for a traffic violation near Dayton, Ohio. The driver was **Larry SMITH**. One of the passengers was Breanna **COMPTON**. After waiving her *Miranda* rights, Compton admitted to possessing an unknown amount of narcotics inside of her body. She advised that she would cooperate and retrieved the narcotics. The Miami Valley Regional Crime Laboratory determined the narcotics were a mixture of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, with a net weight of 113.26 grams.

6. After waiving her *Miranda* rights, **Chrissy PARSONS** stated that she and **Larry SMITH** had traveled from Portsmouth, Ohio to Dayton, Ohio to purchase drugs. They were returning with the drugs to Portsmouth, Ohio when stopped by the OSHP trooper.

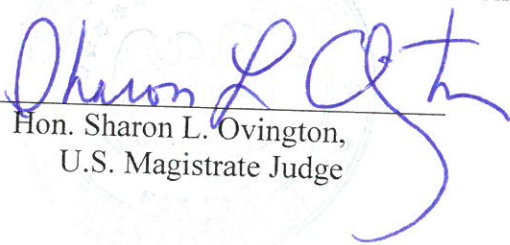
7. After waiving her *Miranda* rights, **Breanna COMPTON** stated that she, **SMITH**, and the second passenger were making a “dope run.” **COMPTON** had traveled to Dayton for the specific purpose of body carrying drugs back to Portsmouth, Ohio. She had been recruited by the second passenger. She would receive a small amount of the drugs for payment. She stated **Larry SMITH** was paid for driving her back and forth from Portsmouth to carry the drugs. **COMPTON** had made the trip several times since the summer of 2018.

8. After waiving his *Miranda* rights, **Larry SMITH** stated that someone would contact him to pick up a girl in Portsmouth. **SMITH** and the designated female would then drive to Dayton, obtain heroin, and the female would conceal the heroin on her person. **SMITH** would receive \$400 per trip for driving. **SMITH** stated the financial backer of the operation was the second passenger.

9. Based on my training and experience, I know that the amount of heroin seized was for distribution not personal use.


Fred Zollers
FBI Task Force Officer

Sworn to and subscribed before me on this 31st day of July, 2019.


Hon. Sharon L. Ovington,
U.S. Magistrate Judge